

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA)	
)	No.: 2:20-CR-065
v.)	
)	
EMORY Q. JACKSON)	

**UNITED STATES' SUPPLEMENTAL RESPONSE TO
DEFENDANT'S MOTION IN LIMINE NO. 1**

The United States of America, by and through the Acting United States Attorney for the Eastern District of Tennessee, objects in part to the defendant's motion to preclude the introduction of videos and images of, or reference to the defendant's possession of firearms in this case. (Doc. 98).

As previously stated in the United States response (Doc 103) and incorporated herein by reference, the United States objects to the preclusion or redaction of evidence that is proof of the offenses in this case. The United States contends that the below listed videos and images are relevant and probative to proof of the crimes charged in this case.

Nonetheless, the United States has agreed to collaborate with counsel for the defendant to redact any portions of the videos or images that are not relevant to the offenses charged, such as inappropriate language, text or auditory, or any reference to gang symbols, if redacting or substituting the words would not harm the probative value of the videos or images.

Below are some of the videos and images the United States intends to offer into evidence during its case in chief (as numbered in Court Hearing Exhibit List, Doc. 109):

5. Facebook Google Chrome File Path Name: 18-09.53.pgn
7. Facebook Google Chrome File Path Name: 13-16-09.mp4
8. Facebook Google Chrome File Path Name: 17-07-42.mp4

9. Facebook Google Chrome File Path Name: 17-11-31.mp4

10. Facebook Google Chrome File Path Name: 17-16-24.mp4

Wherefore the United States objects to the preclusion of the images and videos that are evidence of the offenses charged as their probative value is not outweighed but any potential prejudice to the defendant.

Respectfully submitted, this Monday, August 16, 2021.

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